494 Eighth Avenue, Suite 505 • New York, New York 10001 Tel: (212) 268-2920 • Facsimile (212) 268-2921 Law@ChatrathLaw.com

August 23, 2007

Via Electronic Filing Only

Honorable William H. Pauley United States District Court Southern District of New York 500 Pearl Street, Room 2230 New York, New York 10007

Re: CMA-CGM (AMERICA), INC. v. BELSUN, CORP.

Index Number: 06 Civ 6951 (Judge Pauley)

Our Reference: L-1637

Honorable Sir:

My law firm has been retained to represent the defendant in this matter.

I write this correspondence to request an extension of time to respond to the complaint in this action.

Counsel for the plaintff, Albert J. Avallone, Esq., of the Law Offices of Albert J. Avallone & Associates, has stipulated (copy attached) to an extension of time up to and including September 21, 2007. As such, please it is requested that the Court grant this letter application.

Thank you for your courtesies herein. Should you have any questions and/or concerns, please do not hesitate to contact the undersigned.

Very truly yours, THE CHATRATH LAW FIRM, P.C.

Sandap Chatrath

SC/ca By: Sanddeep Chatrath

Encs.

cc: Law Offices of Albert J. Avallone & Associates - via first class mail

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK ____X Index No.: 6951/07

CMA-CGM (AMERICA), INC.,

-against-

Plaintiff,

STIPULATION EXTENDING TIME T

ANSWER

BELSUN CORP.,

Defendant,

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, automeys for the parties hereto, that Defendant's time to interpose an answer, in relation to the matter herein, is hereby

extended to 21st day of September, 2007.

This stipulation may be signed in counterparts and facsimile signatures shall be treated as originals

DATED:

New York, New York

August 20, 2007

New York, New York August 22, 2007

THE CHATRATH LAW FIRM, P.C. Attorneys for Defendants

By: Sanddeep Chatrath, Esq. 494 Eight Avenue, Suite 505 New York, New York 10001

(212) 268-2920

LAW OFFICES OF ALBERT J. AVALLONE & ASSOCIATES

Attorneys for Plaintiff

TJ. Availone - AA1679

55) Fifth Avenue - Suite 1625

New York, New York 10176

(212) 696-1760

194 Eighth Avenue, Suite 505 New York, New York 10001 (212) 268-2920